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July 1, 2013

VIA FACSIMILE: (212) 805-7925

The Honorable Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street, Room 620
New York, New York 10007

Re: Lee v. Pinkus, et al. (No. 1:13-cv-03000-RWS)

Dear Judge Sweet:

This Firm represents Samuel L. Pinkus (“Pinkus”), Gerald Posner, Leigh Ann Winick, Veritas Media, Inc., Philologus Procurator, Inc., Nassau Marketing LLC and Keystone Literary LLC (collectively, the “Named Defendants”) in the above-referenced case. I write respectfully to request that the Named Defendants be granted an additional 30-day extension of time to answer, move or otherwise plead in response to Plaintiff’s complaint.

Gloria C. Phares of Patterson Belknap Webb & Tyler LLP, counsel for Plaintiff in this case, consents to the additional 30-day extension of time for a response by the Named Defendants. This is the Named Defendants’ second request for an extension of time. The Named Defendants’ response to the complaint was originally due on June 3, 2013. On June 8, 2013, Your Honor granted the Named Defendants’ initial request for an extension of time, to and including July 3, 2013.

The Named Defendants request this extension of time in order to pursue present discussions about a possible resolution of this matter with Plaintiff and, should it be necessary, to have an adequate opportunity to prepare their first pleading before this Court. Since our previous correspondence with the Court, each of the seven Named Defendants in this action has also been named as a defendant and served, along with additional defendants Simon & Schuster, Inc. and HarperCollins Publishers LLC, in a separate action filed by Plaintiff Nelle Harper Lee’s former literary agency in the Commercial Division of the Supreme Court of the State of New York, New

*So order'd
Sweet
SDNY 7.7.13*

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York County. See *McIntosh & Otis, Inc. v. Pinkus, et al.*, No. 6521117-2013 (N.Y. Sup. Ct. June 14, 2013). The Named Defendants here request additional time in part to coordinate their responses to the two actions. The number of Named Defendants in this matter and the even larger number of named defendants in the new state court matter, moreover, complicate coordination related to any possible resolution and related to the Named Defendants' initial response in this case.

Therefore, the Named Defendants respectfully request that the time to answer or otherwise respond be extended 30 days to and including August 2, 2013.

Respectfully submitted,



Ruth E. Harlow
Counsel for Named Defendants

cc: Gloria C. Phares, Esq. (Counsel for Plaintiff)
Vincent V. Carissimi, Esq. (Counsel for Named Defendants)